

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL ARRINGTON, an individual,

Plaintiff,

v.

JENNIFER ALLEN, an individual,

Defendant.

Case No.: 2:13-cv-00810-JLR

DEFENDANT'S ANSWER

As and for her Answer to the Complaint, Defendant Jennifer Allen, alleges and pleads:

1.1 Defendant DENIES the states of mind and intent attributed to her in Paragraph 1.1 of the Complaint.

2.1 Defendant ADMITS that this action is between citizens of different states as alleged in Paragraph 2.1 of the Complaint and DENIES for lack of knowledge the amount in controversy.

2.2 Defendant DENIES that venue is appropriate in the Western District of Washington as alleged in Paragraph 2.2 of the Complaint. Defendant affirmatively asserts and pleads that she is now, and has been at all relevant times, a resident of San Francisco, California.

3.1 Defendant ADMITS the first sentence of Paragraph 3.1 of the Complaint and DENIES for lack of knowledge the second sentence of that Paragraph.

1 3.2 Defendant ADMITS the allegation in Paragraph 3.2 of the Complaint.

2 4.1 Defendant ADMITS the allegation in paragraph 4.1 of the Complaint and asserts and
3 pleads that her statements about Plaintiff were her true belief.

4 4.2 Defendant ADMITS the allegation in Paragraph 4.2 of the Complaint and asserts and
5 pleads that her statements about Plaintiff were her true belief and further asserts and pleads that
6 she was incorrect in stating the date on which incidents with Plaintiff occurred.

7 4.3 Defendant ADMITS the allegation in Paragraph 4.3 of the Complaint and asserts and
8 pleads that her statements about Plaintiff were her true belief.

9 4.4 Defendant ADMITS the allegation in Paragraph 4.4 of the Complaint and asserts and
10 pleads that her statements about Plaintiff were her true belief.

11 4.5 Defendant ADMITS the allegation in Paragraph 4.5 and asserts and pleads that her
12 statements about Plaintiff were her true belief and further asserts and pleads that she was
13 incorrect in stating the date on which an incident with Plaintiff occurred.

14 4.6 Defendant ADMITS the allegation in Paragraph 4.6 and asserts and pleads that her
15 statements about Plaintiff were her true belief.

16 4.7 Defendant ADMITS the allegation in Paragraph 4.7 and asserts and pleads that her
17 statements about Plaintiff were her true belief.

18 4.8 Defendant DENIES for lack of knowledge the allegation in Paragraph 4.8.

19 4.9 Defendant cannot determine the nature of the allegation in Paragraph 4.9 of the
20 Complaint and therefore DENIES it.

21 4.10 Defendant DENIES the allegation contained in Paragraph 4.10 of the Complaint.

22 4.11 Defendant DENIES the allegation contained in Paragraph 4.11 of the Complaint.

23 4.12 Defendant DENIES the allegation in Paragraph 4.12 for lack of knowledge.

24 4.13 Defendant DENIES the allegation in Paragraph 4.13 for lack of knowledge.

25 4.14 Defendant DENIES the allegation in Paragraph 4.14 of the Complaint and further
26 affirmatively asserts and pleads that Plaintiff is a Public Figure.

4.15 Defendant ADMITS the allegation in Paragraph 4.15 of the Complaint.

1 4.16 Defendant ADMITS that she refused to retract the statements alleged in Paragraph
2 4.16 the Complaint and DENIES the remaining allegations in that Paragraph.

3 5.1 Paragraph 5.1 of the Complaint is a statement to which a response is not required.

4 5.2 Defendant DENIES the allegation in Paragraph 5.2 of the Complaint.

5 5.3 Defendant DENIES the allegation in Paragraph 5.3 of the Complaint.

6 5.4 Defendant DENIES the allegation in Paragraph 5.4 of the Complaint.

7 By way of Affirmative Defenses, Defendant alleges and pleads:

8 6.1 That Plaintiff is a Public Figure;

9 6.2 That Defendant's statements about plaintiff are true and believed to be true;

10 6.3 That venue in this district is improper.

11 Defendant reserves the right to add such other and further affirmative defenses as may be
12 disclosed during discovery.

13
14 STOKES LAWRENCE, P.S.

15
16 By: s/Kelby D. Fletcher

17 Kelby D. Fletcher (WSBA #5623)
18 Justo G. Gonzalez (WSBA #39127)
19 Stokes Lawrence, P.S.
1420 Fifth Avenue, Suite 3000
Seattle, WA 98101-2393
20 (206) 626-6000

21 Nathan Goldberg (*pro hac vice*)
22 Allred, Maroko & Goldberg
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048
23 (323) 653-6530

24 Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2013, I caused the foregoing Defendant's Answer to be:



electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Sheryl J. Willert
Williams Kastner & Gibbs PLLC
601 Union St Ste 4100
Seattle, WA 98101-2380

William I. Aloe
Williams Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, WA 98101

s/Kelby D. Fletcher

Kelby D. Fletcher (WSBA #5623)
Stokes Lawrence, P.S.
Attorneys for Defendant
1420 Fifth Avenue, Suite 3000
Seattle, WA 98101-2393
(206) 626-6000

Attorneys for Defendant